

UNITED STATES DISTRICT COURT  
DISTRICT OF MASSACHUSETTS

|                                 |   |                                     |
|---------------------------------|---|-------------------------------------|
| RUTH HEINE,                     | ) |                                     |
|                                 | ) |                                     |
| Plaintiff,                      | ) |                                     |
|                                 | ) |                                     |
| v.                              | ) |                                     |
|                                 | ) | Civil Action Docket No: 05-11117WGY |
| PARKWAY AUTO REALISATIONS, LLC, | ) |                                     |
| f/k/a AUTO EUROPE, LLC, d/b/a   | ) |                                     |
| AUTO EUROPE,                    | ) |                                     |
|                                 | ) |                                     |
| Defendant.                      | ) |                                     |

**JOINT MOTION TO EXTEND FACT DISCOVERY TO JULY 31, 2006**

NOW COME the parties in the above-entitled matter and respectfully seek leave to extend the deadline by which to complete fact discovery to July 31, 2006. As grounds therefore, the parties state as follows:

1. The Court adopted the parties Joint Statement's plan for discovery. The plan included a deadline by which to complete fact discovery to March 31, 2006, which was extended to May 31, 2006.
2. However, due trial schedules of both counsel, and to travel schedules of the parties and witnesses, the parties were unable to complete fact discovery by March 31, 2006.
3. The parties do contemplate that they will be able to complete all discovery by July 31, 2006 without disturbing the pre-trial and trial dates or any other aspect of the scheduling in this case.

WHEREFORE, the parties seek leave to extend the fact discovery deadline to July 31, 2006 and the corresponding motion deadline to August 31, 2006.

Respectfully submitted,

For the Plaintiff

/s/ Sol J. Cohn

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